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ORIGINAL

November 15, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary - Room TWB-204
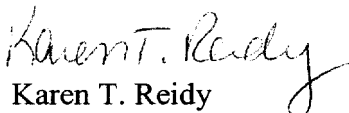445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte: CC Docket No. 98-121

Dear Ms. Salas:

On November 15, 1999, the attached letter and additional attachments were sent to Jake Jennings of the Common Carrier Bureau's Policy and Program Planning Division. Please include this filing in the record of the above-referenced proceeding.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Karen T. Reidy

Karen T. Reidy

Attachments

cc: Jake Jennings

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November 15, 1999

Mr. Jake Jennings
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Dear Mr. Jennings:

On October 29, 1999, we addressed with you, Andrea Kearney, Bill Agee, and Claire Blue our concerns with the third party test plan being implemented in Georgia. This letter and the enclosed Attachment I summarize our discussion.
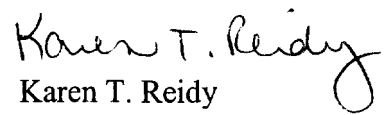
On May 20, 1999 the Georgia PSC ordered a "focused audit" of BellSouth's OSS. On June 1, BellSouth filed a proposed master test plan ("MTP") that it drafted. The Georgia PSC accepted comments from CLECs, but approved the MTP as filed, subject to the requirement that CLECs be permitted to comment on the interim and final reports submitted by the testers. Although the plan has been revised twice, first by Hewlett-Packard and then by KPMG, the framework and substance of the test remains largely the same as BellSouth's initial filing.

One result of BellSouth's influence over the crafting of the MTP is that BellSouth was able to hand pick the type and mix of orders reflected in the test scenarios. These test scenarios do not represent a complete picture of the orders BellSouth would have to process in a commercial environment, particularly for competitors attempting to serve residential customers. Some of the key scenarios missing from the MTP are listed in Attachment II.

We discussed a number of other deficiencies in the MTP, including its failure to: include CLECs in the testing process; test OSS 99; require the tester to build the OSS interfaces being tested; specify an exception process; validate the performance measures being used to judge the test; adopt appropriate volume testing; test xDSL capabilities; effectively test change management; test key features and functions and test processes such as help desk, account team and CLEC training. You requested that we provide an outline of the topics we discussed. The outline you requested is enclosed as Attachment I.

Please let me know if you have any additional questions.

Sincerely,

Karen T. Reidy

cc: Andrea Kearney
       Bill Agee
       Claire Blue

ATTACHMENT I: KEY DEFICIENCIES IN GEORGIA MTP

1. The MTP Envisions a Closed Process

The MTP excludes CLECs from participation. For example, the current plan does not call for CLECs' involvement in the development and execution of the test, in the definition and implementation of the exception process, or in the determination of what performance measures and standards will be used. Such CLEC participation should be invited to help ensure that the test reflects the environment competitors experience, and ensure that improvements made as a result of testing truly promote competition.[1]

MCI WorldCom has learned that CLECs recently have been invited by KPMG to participate in side-by-side testing, but the extent and details of this testing are unclear. Indeed, because BellSouth has not made the UNE platform available, CLEC testing necessarily would be limited as a practical matter. Other than this proposed testing, CLEC involvement is limited to commenting on the tester's interim and final reports. Such minimal inclusion of CLECs in the testing process is a major flaw in the Georgia test.

2. The MTP Does Not Require Testing of OSS 99

Perhaps the most glaring omission resulting from BellSouth's influence over the test design is the failure of the MTP to require the testing of OSS '99, which is the name for the ordering systems BellSouth is developing for release next month and in January 2000. OSS '99 represents a major change in BellSouth's interfaces including provision of additional functionality, significant revamping of existing functionality, and substantial modification of BellSouth's backend systems. The scope of the modification is at least partially apparent from the fact that BellSouth's current OSS is based on LSOG 1 (with some additional BellSouth proprietary fields) while OSS '99 is based on a LSOG 3 and LSOG 4. The modification also includes moving from some proprietary fields to more industry standard fields. Thus, basic forms such as the Local Service Request and End User forms are being modified, effecting the method and format CLECs must use when placing orders.

Moreover, as noted in our letter to Andrea Kearney, Policy Division, dated July 21, 1999, OSS '99 includes a number of new and enhanced functionalities that are lacking in BellSouth's current interfaces. BellSouth's Project Status Report dated November 9, 1999 lists substantial changes that will be provided in OSS '99. (See Attachment III.) One example of functionality that MCI understands BellSouth will provide in OSS '99 but that is not apparent from the Status Report is non-repudiation. Non-repudiation is a

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[1] Even Bell Atlantic recognizes the need for CLEC participation. Edward Young, Bell Atlantic Senior VP-Regulatory, said that they "learned that by including CLECs at the beginning, we got a better test." NARUC Notebook, COMM DAILY, November 12, 1999. According to Mike Weeks, KPMG project manager for the OSS testing in New York, a meaningful test requires the testing of the "whole business relationship between the wholesaler and retailer", in addition to testing the OSS itself. Id.

component of the SSL3 layer for pre-ordering. Non-repudiation ensures that when pre-order inquiries are "lost," for example, there is a way to track those inquiries and determine the source of the problem. Prior to introduction of SSL3, use of a Value Added Network allowed the tracking of inquiries but only non-repudiation does so once SSL3 is introduced. Non-repudiation is not part of BellSouth's current OSS and will not be tested in the MTP.

MCI WorldCom also understands that the current limit in the number of lines you can submit on one purchase order number (325) will be increased in OSS '99. These are some of the examples of significant changes in OSS '99. Since the goal of a third party test is to promote competitive market entry, it is crucial that the OSS '99 interfaces, the ones CLECs will be using in entering the market, be tested.

3. The MTP Does Not Call for the Tester to Build all Key Interfaces

The only way to test whether an ILEC provides sufficient information for a CLEC to develop an interface is for the tester to build the interface using the ILEC's business rules and other documentation. But BellSouth's MTP states that "test clients" maintained by BellSouth for internal testing purposes will be used to test certain interfaces. The MTP states that "due to operational and time constraints of the [Georgia PSC's] procedural Order," KPMG and HP will access the TAG preordering and ordering interface and the ECTA maintenance and repair interfaces with such test clients. (MTP, II-2.) In addition, BellSouth's EDI PC software will be used for the EDI billing functionality test. (MTP, III-4.)

The MTP states that for functional EDI testing other than for billing, EDI LAN to LAN will be used. The MTP does not expressly state whether HP will build that interface, but even if it does HP would not be putting itself in the same position as a CLEC because it would be submitting orders from within BellSouth's local area network. CLECs must submit orders from outside that network, which requires additional interface development and can result in additional problems when submitting orders such as loss of connectivity.

When MCI WorldCom developed the EDI 7.0 ordering interface based on the documentation provided by BellSouth, extensive and costly editing and debugging was required. This experience demonstrates the need to test BellSouth's interfaces by building to them. If BellSouth's business rules and documentation are accurate, building the interface should not significantly extend the length of the test. More importantly, complete and accurate documentation will significantly decrease the time and cost for CLECs to build the interface.

4. The MTP Does Not Provide a Defined Exception Process

Prior to KPMG's recent revision of the MTP, it classified test failures as severity level 1, 2 or 3 and expressly stated that failures falling into any of those categories would require retesting[2]. Now, the MTP vaguely states:

> KPMG will identify exceptions where significant defects in components (software, documentation, or process) are uncovered during the testing activities. KPMG, the Commission, and BellSouth will address exceptions through a process defined by the three parties. If a significant number of test conditions fail or are not covered, the test cycle will be rescheduled for execution following implementation of the appropriate corrective measures.

(MTP, III-5.) KPMG's October 25, 1999 Interim Status Report states that the Georgia PSC, KPMG and BellSouth have agreed to an exception process, but does not specify what the process is. There is therefore no assurance as yet that the testers will engage in satisfactory military style testing that requires all significant problems to be solved and systems improved before a passing grade is received.

5. The MTP Does Not Call for Validation of BellSouth's Performance Metrics

The MTP does not require KPMG to determine whether BellSouth's performance metrics establish a valid basis for comparing the OSS performance BellSouth provides to its retail units versus what it provides to CLECs. The vague statement in the MTP's global entrance criteria that BellSouth's performance metrics must be "fully functional, tested and operationally ready" fails to give assurance that performance measures will be validated.

The MTP also does not provide for sufficient validation of BellSouth's methods and procedures for collecting, storing and calculating data on OSS performance for CLECs. Just as importantly, validation of performance data for BellSouth's retail systems is not required. Such validation is necessary to ensure not only that the data is accurate, but that the data captures the full extent of BellSouth's retail capabilities.

The MTP requires an audit of flow through only for a limited range of order types. The MTP does not evaluate BellSouth's assertions concerning which order types do and do not flow through its retail systems. These assertions should be evaluated during the third party testing process.

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[2] An exception process should provide detailed explanations of the problems including the specific impact on the consumers and competitors. These should be publicly accessible on a neutral web site to ensure all interested parties are aware of the issues.

6. The MTP Calls for Volume Testing in a Test Environment

The MTP states that, with the exception of the CRIS database, "[n]ormal and peak volume tests will be run against a volume test environment (RSIMMS) developed by BellSouth to support the transaction volumes specified in the test." "(MTP, II-3.) One eight hour volume test to be run against a production environment has been added to the test, but it is not clear what volumes would be tested. Volume testing should be carried out in a production environment, not in a test environment controlled by BellSouth.

7. The MTP Does Not Require Testing of xDSL Capabilities

The MTP does not test the ordering and provisioning of xDSL capable loops and collocation, which are key to broadband deployment by the CLECs. Among other things, spectrum management and access to bandwidth and other information regarding the composition of the loop must be tested to ensure CLECs can compete in the emerging broadband market.

8. The MTP Does Not Include an Effective Test of Change Management

BellSouth's plan calls for the assessment of change management only through review of documentation and interviews. The test does not "test" change management because it does not provide for the observation of what transpires between BellSouth and the CLECs when BellSouth makes changes to its OSS. In particular, the MTP does not require the tester to observe how BellSouth handles change management during a major software release, which is when one can determine whether policies on paper work in practice.

9. The MTP Excludes the Testing of Key Features and Functions

As mentioned in the letter, the MTP limits the types of scenarios being tested. We have included a list of key scenarios missing from the test plan in Attachment II.

Some of the flaws in the MTP are really flaws in the functional attributes of BellSouth's OSS. One OSS function necessary for competitive entry which BellSouth refuses to provide CLECs is customers service records (CSRs) that can be fully parsed. Consequently, the MTP does not test this function. Parsed CSRs are essential to enable CLECs to pre-populate orders based on pre-ordering information. Thus, although the MTP claims to test integration of ordering and pre-ordering, it cannot in fact be fully covered without parsed CSRs.

4

10. The MTP Does Not Test Support Functions and Processes

The MTP does not call for the testing of end-to-end customer services. For example, it does not include a test of BellSouth's help desk, its account team, or its CLEC training[3]. These functions are critical to addressing day-to-day problems during a market launch, and should be evaluated.

11. Full Combination of Elements and Customized Routing Should Be Tested

The MTP should clearly indicate that an order for the combination of the following will be tested: NID, loop, port, vertical features, local switching, tandem switching, shared transport, signaling, databases (including the LIDB and calling name databases), and operator services and directory assistance (OS/DA). Although it was not raised during our discussion on October 29, one additional point is worth noting. In its UNE Remand Order, the FCC concluded that an ILEC is not required to provide OS/DA as an unbundled element if the ILEC provides customized routing for CLECs[4]. In the past, BellSouth was not able to provide effective customized routing to CLECs' OS/DA platforms because BellSouth was unable to transmit OS/DA calls using feature group D or some other mutually agreeable signaling protocol that could transmit all necessary call information. If BellSouth claims that it now can provide effective customized routing, it will be critical that BellSouth's ability to process and provision orders with selective routing be tested.

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[3] The introduction to the MTP states that KPMG will access or use the Account Team and CLEC training (MTP, II-3), but the MTP does not indicate these support functions will be evaluated as part of the test process.
[4] Third Report and Order, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, ¶ 462, Released November 5, 1999. This does not indicate our agreement with the Commission's Order.

Scenario #	Order Scenarios		
	Activity	Res	Bus
	Stand-alone Preorder		
	Address Validation		
1	Fielded Address.	X	X
2	WTN	X	X
3	Fielded address and detailed service address information (e.g., CUSTUNITTYP and UNITINFO, etc.).	X	X
4	Address with a TN that is a "non-published" account.	X	X
5	Address with a TN that is a "non-list" account	X	X
6	Address with a TN for a published account	X	X
7	Fielded service address for a multi-tenant customer	X	
8	WTN for a multi-tenant customer	X	
9	WTN for existing platform account		
10	Fielded address – customer has 2 lines at a multi-tenant location	X	X
11	Partial match within a multi-tenant customer location	X	X
12	Service address contains a special character	X	X
	Telephone Number Inquiry		
1	Telephone number selection based upon a valid fielded address inquiry and requesting two (2) random telephone numbers. Reuse customer details from Test Case 1.	X	X
2	Return two (2) telephone numbers from Scenario #1 Two transactions required.	X	X
3	Exchange of one telephone number from test case #1	X	X
4	Telephone number selection based upon a valid fielded address inquiry and requesting three (3) GOLD telephone numbers. Residential customer.	X	X
5	Return three (3) telephone numbers from Scenario #4	X	X
6	Telephone number request for a Vanity # using the REQNUM field	X	X
	Customer Service Record (CSR) CRIS Inquiry		

Scenario #	Order Scenarios	Res	Bus
	Activity		
1	Non-parsed format	X	X
2	Parsed format .	X	X
3	Parsed format – multiline		X
4	Non-parsed format - SA & LA contain equal values.	X	
	Parsed format	X	
5	Non-parsed format –. Different SA & LA values.	X	
6	Parsed format –customer has additional listings.	X	
7	Specific ATN but lacking the correct Agency Authorization Indicator.	X	
8	Parsed format for a Non-Pub account	X	
	Due Date Availability		
1	Inquiry.	X	X
2	Inquiry and one (1) year in advance..		X
	Directory Listing Inquiry		
1	Straight line listing.	X	X
2	"Non-list".	X	X
3	Caption Listing .		X
4	All 1st Level Sub-Caption Listings		X
	Installation Status Inquiry		
1	POTS request. (Will require FOC prior to submitting an inquiry)	X	
2	ISDN.	X	X
3	Special Telephone Number format.		X
	Feature and Service Availability Inquiry		
1	Specific Features and Services to be determined.	X	X
	Loop Qualification Inquiry		
1	Re-grade of an existing account.	X	X

Scenario #	Order Scenarios		
	Activity	Res	Bus
2	Re-grade of an existing account with a reservation request.	X	X
3	Extended loop qualification for premium link service.	X	X
4	Extended loop qualification and reservation for premium link service.	X	X
	Access Billing Customer Service Record (CSR) Inquiry		
1	Request designating a specific month and entire details.	X	X
2	Request with no month specified and specific section.	X	X
3	Request designating a specific month, section, and feature.	X	X
	Service Order from SOP Inquiry		
1	Using a BST-GA service order identification.	X	X
2	Using a BST-GA BTN.	X	X
3	Using an MCI PON.	X	X
4	Using a BST-GA circuit identification.	X	X
5	Using a BST-GA customer name.	X	X
	Resale		
1	Change customer PIC	X	X
2	Change customer LPIC	X	X
3	Add a new Directory Listing on Existing Account	X	X
4	Migration with Directory Listing Change	X	X
5	Migration of an account that has existing BST-GA Company Initiated Blocking	X	X
6	Migration of an account that has an existing BST-GA order pending	X	X
7	Migration of an account with distinctive ringing features, e.g. (Ringmate) .	X	X
8	Migration of an account that has an existing service contract		X
9	Migration of some, but not all, of a multi-line account		X
10	Migration of an account where more than one DA listing exists	X	X
11	Establish new CLEC end user account with request for Vanity #.		
	UNE-p		
1	Convert line to xDSL		X

3

Scenario #	Order Scenarios		
	Activity	Res	Bus
2	Add and Changes for a wide selection of features	X	X
3	As is with a Directory Listing Change	X	X
4	Add a new Directory Listing on existing account		
5	Add and Changes to DID service		X
6	Migration of an account that has BST-GA Company Initiated Blocking		X
7	Migration of an account that has a pending BST-GA order		X
8	Migration of some but not all lines of a multi-line account		X
9	Migration of an account that has an existing BST-GA term/volume contract		X
10	Establish new CLEC end user account with request for Vanity #.	X	X
11	Migration of an account with more than 325 lines		X
	UNE		
1	Standalone Directory Request	X	X
2	Full and Partial Migration w/Directory Listing	X	X
3	Add new xDSL Loop	X	X
4	Add new xDSL Loop with shared line voice and data capability	X	X
5	Standalone Number Portability	X	X
6	Establish new CLEC end user account with request for Vanity #.	X	X

OSS'99
Project Status Report
November 9, 1999

Client:	Interconnection Services/CLECs	Stage:	LNP - Construction Non-LNP - Testing
NCS/ITS Prog. Mgr:	E. R. Stewart	Length of Project:	356 days
		Status of Project:	73% Complete

1. OSS'99 Scope:

The primary business driver is the joint CLEC and BST effort to combine the best features of TCIF 8, 9, and 10 for implementation. The original implementation was slated for Release 6.0 on September 25, 1999. The revised implementation will occur in two stages: Non-LNP Functionality - Production 12/18/99

                                 LNP Functionality - Production 1/30/00

This release grew out of discussions with CLECs during Electronic Interface Change Control meetings. OSS'99 features included in the final scope are listed in the table below.

DESCRIPTION	INTERFACE			
	EDI	LENS	TAG	Robo TAG
Remove the Issue 6 Map	X	X		
Transfer of Calls – to allow ordering of "referral of calls" for end user customers	X	X	X	X
Provide WSOP (Working Service on Premise) - to advise that working service at a location is an abandon station	X	X	X	X
PIC/LPIC Enhancements – to allow the choices "no change", "undecided", and additional freeze options	X	X	X	X
Update Directory Listings capabilities to enhance stand-alone listing orders, and allow 6 degrees of indention, and captions *(also LNP)*	X	X	X	X
Update or add the following inputs for OSS'99 in accordance with OBF standards: LSR (Local Service Request) *(also LNP)* EU (End User) *(also LNP)* LS (Loop Service) LSNP (Loop Service with Number Portability) *(LNP)* NP (Number Portability) *(LNP)* PS (Port Service) RS (Resale Service – Non-Complex)	X	X	X	X
Enhance the LSC (Local Service Request Confirmation)	X	X	X	X
Hunting Functionality – to provide series completion, in accordance with OBF standards for business, residence, and PBX lines	X	X	X	X
DID Service - to allow orders that establish new, and add to existing, DID trunk groups and number groups on existing accounts	X			
ISDN – BRI - to allow orders that establish new, and modify existing, ISDN BRI services	X		X	X
PBX Service – to allow orders that establish new, and modify existing, PBX trunk groups on existing accounts	X		X	X
Digital Loop Service - to allow orders for DS0s, DS1s, and ISDN as Digital Loops	X		X	X
Update EDI Technical Specs for OSS'99 - EDI to design a new	X			

OSS'99
Project Status Report
November 9, 1999

DESCRIPTION	INTERFACE			
	EDI	LENS	TAG	Robo TAG
application file layout that will include additional fields and records to accommodate changes as a result of OSS'99.				
Enhance Jeopardy presentation to allow ease of interpretation *(also LNP)*	X	X	X	X
Enhance the FOC/CN (Firm Order Confirmation and Completion Notification to allow ease of interpretation *(also LNP)*	X	X	X	X
Implement New ACT (Activity) Types "P" & "Q" for Partial Migrations – to allow CLECs to order initial and subsequent partial migrations on an account. ACT Type = P (Partial Migration - Initial) ACT Type = Q (Partial Migration - Subsequent *(also LNP)*	X	X	X	X
Blocking Enhancements – to allow the CLECs ease in choosing blocking options (Toll Billing Exceptions and Directory Assistance Call Completion Block)	X	X	X	X

Enhanced Pre-Order Functions: Address Validation
Telephone Number Inquiry
Telephone Number
    Reservation/Cancellation
Feature/Service Availability
Customer Service Information
Scheduling Inquiry (Due Date in
    Inquiry Mode)
			X	X

2. Key Success Criteria:

1. Release goes into production 12/18/99 for Non-LNP Functions and 1/30/99 for LNP Functions as scheduled
2. Implement features within project scope